



**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

11/02/2009

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER:	NYR000169342
INSTALLATION NAME:	GM COMPONENTS HOLDINGS LLC
INSTALLATION ADDRESS :	200 UPPER MOUNTAIN RD MANUFACTURING PLANT LOCKPORT, NY 14094
MAILING ADDRESS :	200 UPPER MOUNTAIN RD MANUFACTURING PLANT LOCKPORT, NY 14094

EPA Form 6700-12AB (4-89)

USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866

ATTN: RCRA NOTIFICATIONS
Tel: (212) 637-4106
Fax: (212) 637-4437

TO: GM COMPONENTS HOLDINGS LLC
or Current Occupant
ATTN: CYNTHIA TUDOR-SCHUIJZ
200 UPPER MOUNTAIN RD
MANUFACTURING PLANT
LOCKPORT, NY, 14094

SEND COMPLETED FORM TO:
The Appropriate State or EPA Regional Office.

United States Environmental Protection Agency

**RCRA SUBTITLE C SITE IDENTIFICATION FORM**

1. Reason for Submittal
(See instructions on page 13.)

MARK ALL BOX(ES) THAT APPLY

Reason for Submittal:

- ☒ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

2. Site EPA ID Number (page 14)

EPA ID Number

N Y R 1 0 0 0 1 6 9 3 4 2

3. Site Name
(page 14)

Name: GM Components Holdings, LLC

4. Site Location Information
(page 14)

Street Address: 200 Upper Mountain Road, Manufacturing Plant

City, Town, or Village: Lockport

State: NY

County Name: Niagara

Zip Code: 14094

5. Site Land Type
(page 14)

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)

A. 3 3 6 3 9 1

B. 3 3 6 3 9 9

C.

D.

7. Site Mailing Address
(page 15)

Street or P. O. Box: 200 Upper Mountain Road, Manufacturing Plant

City, Town, or Village: Lockport

State: New York

Country: USA

Zip Code: 14094

8. Site Contact Person
(page 15)

First Name: Cynthia

MI: M.

Last Name: Tudor-Schultz

Phone Number: (716) 439-3302 Extension:

Email address:

9. Operator and Legal Owner of the Site
(pages 15 and 16)

A. Name of Site's Operator:
GM Components Holdings, LLC

Date Became Operator (mm/dd/yyyy):
10/06/2009

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner:
GM Components Holdings, LLC

Date Became Owner (mm/dd/yyyy):
10/06/2009

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

Called 10/20/09 spoke to Kullen informed her of EDH
(R)

9. Legal Owner (Continued) Address	Street or P. O. Box: 300 Renaissance Center, MC 482-C14-C66	
	City, Town, or Village: Detroit	
	State: Michigan	
	Country: USA	Zip Code: 48265-3000

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous WasteY ☐ N ☒ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note: A
hazardous waste permit is required for this
activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your
site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace
If "Yes", mark each that applies.☐ a. Small Quantity On-site Burner
Exemption☐ b. Smelting, Melting, and RefiningY ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste that apply:

Manage

a. Batteries ☐b. Pesticides ☐c. Mercury containing equipment ☐d. Lamps ☐e. Other (specify) ☐f. Other (specify) ☐g. Other (specify) ☐Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter

If "Yes", mark each that applies.

☐ a. Transporter☐ b. Transfer FacilityY ☐ N ☒ 2. Used Oil Processor and/or Re-refiner

If "Yes", mark each that applies.

☐ a. Processor☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications



Thermal Systems

October 13, 2009

USEPA Region 2
DEPP – RCRA Programs Branch
ATTN: RCRA Notifications
290 Broadway, 22nd Floor
New York, NY 10007-1866
(212) 637-4106

RE: Delphi Automotive Systems, LLC – Lockport Technical Center
200 Upper Mountain Road
Lockport, Niagara County, New York
EPA RCRA ID: NYD 002 126 852

Dear Sir or Madam,

Pursuant to our discussions on September 22, 2009, with Mr. Nathan Edwards, please find enclosed a completed "RCRA Subtitle C Site Identification Form" (EPA Form 8700-12) for the Delphi Automotive Systems, LLC – Lockport Technical Center, as required under 40 CFR 262.12 and 6 NYCRR 372.2(a)(3). Delphi underwent a two-step transaction process on October 6, 2009, resulting in the above-referenced site being operated by a new entity (Delphi Automotive Systems, LLC). The new entity will continue to operate under the current name "Delphi Automotive Systems, LLC", so no name change is required or anticipated. The transfer of ownership and operational control of the facility is not expected to have any immediate material change in the day-to-day operations of the facility.

Also please find the attached Confirmation of Signatory Authority as provided under 40 CFR Parts 70.2, 122.22, 144.32, 270.11, 403.12 and Fed. Reg. 51120 of the United States Federal Regulations.

Thank you for your attention to this matter. Please contact Stacey Jenneve at (716) 439-2946 if you have any questions or concerns.

Sincerely,

Kevin M. Herlan
Site Engineering Director

Attachments (RCRA Site ID Form, Confirmation of Signatory Authority)

cc: William Yeman, NYSDEC Hazardous Waste Section
(via e-mail: wxyeman@gw.dec.state.ny.us)

Delphi Global Technical Services

GM Component Holdings, LLC
Lockport Manufacturing Plant
200 Upper Mountain Road
Lockport, NY 14094

October 13, 2009

USEPA Region 2
DEPP – RCRA Programs Branch
ATTN: RCRA Notifications
290 Broadway, 22nd Floor
New York, NY 10007-1866
(212) 637-4106

RE: GM Component Holdings, LLC – Lockport Manufacturing Plant
200 Upper Mountain Road
Lockport, Niagara County, New York 14094
Notification of Regulated Waste Activity, Site Identification Form

Dear Sir or Madam,

Effective October 6, 2009, the Delphi Automotive Systems, LLC Lockport facility (commonly known as Delphi Harrison Thermal Systems) has been purchased by GM Components Holdings, LLC. The transfer of operational control of the Lockport facility has not had, and is not expected to have, any immediate material adverse affect on the day-to-day operations of the manufacturing facility.

Additionally, a portion of the property is leased to a new entity (which has retained the name "Delphi Automotive Systems, LLC") to conduct non-production activities unrelated to the operations of GM Components Holdings, LLC. As previously discussed with Mr. Nathan Edwards on September 22, 2009, GM Components Holdings, LLC is requesting that EPA issue a new RCRA Site ID for its operations at "200 Upper Mountain Road, Manufacturing Plant" to distinguish its waste from the waste of Delphi Automotive Systems, LLC.

The completed EPA Form 8700-12 is attached. If you have any questions or concerns, please contact Cindy Tudor-Schultz at (716) 439-3302, or Greg Kulka at (716) 439-2689.

Sincerely,



Pat Curtis
Plant Manager

Attachment (RCRA Site ID Form)

cc: William Yeman, NYSDEC Hazardous Waste Section
(via e-mail: wxyeman@gw.dec.state.ny.us)

GM Worldwide Facilities Group, Environmental Services

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 24, 2014 - 2:45 PM

Version 5.0

User Selection Criteria

Location:	New York, all activities	Activity Location:	None Chosen
Handler ID:	NYR000169342	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 04/24/2014		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:4 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 24, 2014 - 2:45 PM

Page 2

G M COMPONENTS HOLDINGS LLC

County Name / Code: NIAGARA / NY063

NYR000169342

REGION 02

Location: 200 UPPER MOUNTAIN RD; MANUFACTURING PLANT; LOCKPORT, NY 14094

Mailing: 200 UPPER MOUNTAIN RD; ENV ENGINEERING BLDG 7A; LOCKPORT, NY 14094

Activity Location:	NY	State District:	NYSDEC R9	Accessibility	Non-Modifier:	Extract Flag:	Y	Active Site:	Y
Generator:	LOG	Transporter:	N	Operating TSDF:	IC in Place:	N	EI Indicator (HE / GW) / N		
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	HBM:	N	Support K:		
Full Enforcement:	—	Converter:	—	State Unaddressed SNC:	EPA Unaddressed SNC:	N			
CA WHld:	N	State TSDF:	—	State Addressed SNC:	EPA Addressed SNC:	N			
Active State Gen:	N			State SNC w/Comp Sched:	EPA SNC w/Comp Sched:	N			

Evaluations With No Violations:

CEI Evaluation	08/26/2013	Activity Location:	NY	By: State	Identifier: 001	Person: NYNSL	Branch: R9	Found Violation:	NO
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtle C:	NO	Day Zero:	08/26/2013
CEI Evaluation	10/05/2012	Activity Location:	NY	By: State	Identifier: 001	Person: NYTRN	Branch: R9	Found Violation:	NO
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtle C:	NO	Day Zero:	10/05/2012
CEI Evaluation	09/17/2010	Activity Location:	NY	By: State	Identifier: 001	Person: NYNSL	Branch: R9	Found Violation:	NO
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtle C:	NO	Day Zero:	09/17/2010

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 24, 2014 - 2:45 PM

Page 3

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ("Y" indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ("Y" indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ("+" indicates the exposure exists and is under control; "-" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist) GW - Groundwater Release ("+" indicates the exposure exists and is under control; "-" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary materials (e.g., spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ("Y" indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ("Y" indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility.
State TSDF	It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Treatment, Storage or Disposal facility.
State Addressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is an EPA Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 24, 2014 - 2:45 PM

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
Q	indicates that the handler is a former non-notifier.
X	Indicates that the handler is a non-notifier.

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

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